

# **EXHIBIT 73**

Matthew Lawson - December 2, 2015

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1                   IN THE UNITED STATES DISTRICT COURT  
 2                   FOR THE NORTHERN DISTRICT OF CALIFORNIA  
                   SAN FRANCISCO DIVISION

3	AARON SENNE, et al.,	)	
4	Plaintiffs,	)	
	vs.	)	
5	OFFICE OF THE COMMISSIONER)		CASE NO.
	OF BASEBALL, an	)	3:14-cv-00608-JCS
6	unincorporated	)	(consolidated with
	association doing business)		3:14-cv-03289-JCS)
7	as MAJOR LEAGUE BASEBALL,	)	
	et al.,	)	
8	Defendants.	)	
9		)	

10

11                   ORAL VIDEOTAPED DEPOSITION

12                   MATTHEW LAWSON

13                   DECEMBER 2, 2015

14

15                   ORAL VIDEOTAPED DEPOSITION OF MATTHEW LAWSON,

16                   produced as a witness at the instance of the Defendants

17                   and duly sworn, was taken in the above-styled and

18                   numbered cause on the 2nd day of December, 2015, from

19                   9:13 a.m. to 4:00 p.m., before Melinda Barre, Certified

20                   Shorthand Reporter in and for the State of Texas,

21                   reported by computerized stenotype machine at the

22                   offices of Regus, 100 South 4th Street, St. Louis,

23                   Clayton County, Missouri, pursuant to the Federal Rules

24                   of Civil Procedure and the provisions stated on the

25                   record or attached hereto.

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1 MATTHEW LAWSON,

2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 QUESTIONS BY MS. WEISMAN:

5 Q. Good morning, Mr. Lawson.

6 A. Good morning.

7 Q. We met a few minutes ago off the record, but  
8 I'm going to reintroduce myself on the record. My name  
9 is Jackie Weisman. I'm here representing the defendants  
10 in the lawsuit that you have filed in the Northern  
11 District of California. We're here today in regard to  
12 your deposition.

13 I'm sure your counsel has done this with  
14 you already, but I'm just going to run through a few of  
15 the ground rules and the expectations so that we can  
16 make things run as smoothly as possible today.

17 A. Okay.

18 Q. As you see, there's a court reporter who's  
19 recording everything that I'm saying and will record  
20 everything that you say. In order to make her job as  
21 easy as possible, I would ask that you give clear, oral  
22 responses to all of my questions instead of a nod or a  
23 shake of the head or instead of an "uh-huh" or an  
24 "huh-uh. "

25 A. Okay.

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1 any furniture in it. So I put an air mattress there.

2 Q. And what about Mr. Stoneburner and Mr. Stowell,  
3 where did they sleep?

4 A. In beds in their rooms.

5 Q. They each had their own bedroom?

6 A. Yes.

7 Q. Now, you retired from baseball in June of 2011,  
8 correct?

9 A. Yes.

10 Q. What prompted your decision?

11 A. Unfortunately in 2011 when we moved to Akron,  
12 it was much different than in Frisco because the economy  
13 was a lot less successful.

14 MR. RASIN: Could you keep your voice up,  
15 please?

16 THE WITNESS: Yes, sir.

17 A. Yes, sir. The economy made it more difficult  
18 for my wife to get a job in Akron. Therefore, we were  
19 accounting for multiple bills with only one income.  
20 That wasn't a situation I wanted to be in with her.

21 Q. (By Ms. Weisman) Was there anything else that  
22 contributed to your decision to retire in 2011?

23 A. Well, that was the biggest reason. I was also  
24 struggling with some injuries that were making it  
25 painful for me to play.

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1 Q. What were those?

2 A. I believe I had a little ankle tweak and  
3 chronic patella tendinopathy.

4 Q. Is it fair to say that these were not injuries  
5 that required you to go on the disabled list?

6 A. I believe so.

7 Q. So what did you do when you retired?

8 A. I went back to school and became a volunteer  
9 assistant at Missouri State.

10 Q. When you say you went back to school, you went  
11 back to school at Missouri State?

12 A. Correct.

13 Q. And was this -- how much time did you spend at  
14 Missouri State? Did you get a degree when you returned?

15 A. I just spent a semester there.

16 Q. Was that paid for under your college  
17 scholarship plan with the UPC that we discussed?

18 A. Yes, it was.

19 Q. And why did you only go for one semester?

20 A. Because my wife and I were in a much better  
21 situation once we moved back. She was able to acquire a  
22 job. I had more time off than I would typically have in  
23 an off-season, and overuse injuries were healed. So I  
24 was in a position where playing didn't become a burden  
25 to me anymore.

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1 Q. So, in other words, you returned to baseball.

2 Is that what you're referring to?

3 A. Yes.

4 Q. You came out of retirement?

5 A. Yes. I did come out of retirement that year.

6 Q. So I want to talk for a little bit about what  
7 else you did during the time you were retired. And you  
8 retired, it was in June, you said, correct?

9 A. Yes.

10 Q. And you came out of retirement in March of  
11 2012?

12 A. I made the decision to come out of retirement  
13 in October. Major League Baseball allowed me to come  
14 back on the date that you just suggested.

15 Q. You made the decision in October, you said?

16 A. Yes.

17 Q. Did you communicate that decision to anyone at  
18 either MLB or at a Major League Baseball club?

19 A. Both.

20 Q. To whom?

21 A. So my agent's job was to communicate with  
22 administrations; and he communicated with both the  
23 Indians and I believe any legal teams or anybody that  
24 would help, that would facilitate that transfer with  
25 Major League Baseball.

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1 Q. Do you know who at the Indians your agent spoke  
2 to?

3 A. No. I believe he spoke with the farm director.

4 Q. And you said you're not sure whether he spoke  
5 to anyone at Major League Baseball?

6 A. I'm pretty sure that there were some legal  
7 discussions through Major League Baseball, yes.

8 Q. What do you mean by "legal discussions"?

9 A. The way I understand it is that Major League  
10 Baseball did not want to set a precedent for players  
11 coming out of retirement that would give more players  
12 that idea. So it didn't just come from the Indians,  
13 from my understanding. It was also a decision made by  
14 Major League Baseball as well to make that process a  
15 difficult one to come back.

16 Q. Do you know the name of anyone at Major League  
17 Baseball with whom your agent spoke?

18 A. No.

19 Q. Now, what happened in March of 2012 that you  
20 were ultimately permitted to come out of retirement?

21 A. In my understanding, there were certain  
22 requirements asked of me that I would have to agree upon  
23 to come back; and one of them was to not break camp, not  
24 break spring training with any affiliated team. I would  
25 have to stay in extended spring training.